

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<p>_____, Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>_____, Defendant.</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>CIVIL ACTION NO.</p> <p>_____</p> <p>JUDGE CHARLES ESKRIDGE</p>
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TRIAL WITNESS LIST OF PLAINTIFFS:

**DAVID BURKEY, JEREMY CAMPBELL, MALCOLM GREEN,
CHAS JOCHUM, RAFAEL LOUIS, NATALIE MILLER, TIMOTHY MOFFETT,
TREVON POTTS, CESAR ROMERO, TRACY RUDOLPH,
NATHANIEL RUHOFF, AND WARREN WASHINGTON**

No.	WITNESS NAME	WITNESS ADDRESS
1.	David Burkey	5973 S. Monaco Way Centennial, CO 80111
	<p>x Live <input type="checkbox"/> Deposition x Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian</p> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.</p>	
2.	Jeremy Campbell	358 Druiehlet St. Mansfield, LA 71052
	<p>x Live <input type="checkbox"/> Deposition x Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian</p> <p><i>Brief description of witness capacity and testimonial topics:</i></p>	

	Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.	
3.	Malcolm Green	24047 Schults Meadow Ln Spring, TX 77389
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.	
4.	Chas Jochum	1044 Eddie Ray Rd. Breaux Bridge, LA 70517
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and the working conditions for the other plaintiffs in this case.	
5.	Rafael Louis	8861 Bueche Rd. Erwinville, LA 70729
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.	

6.	Natalie Miller	1817 E Harvard Street Lubbock, TX 79403
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.	
7.	Timothy Moffett	1238 SE Pine St. #B Roseburg, OR 97470
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.	
8.	Trevon Potts	2631 Oak Island Drive, San Antonio, TX 78264
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.	
9.	Cesar Romero	2203 West Desert Lane, Phoenix, AZ 85041
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition	

	<input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.
10.	Tracy Rudolph 4701 Hoffman Rd. Mobile, AL 36619
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff who will testify on her employment with GES and the facts and circumstances that underlie her claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.
11.	Nathaniel Ruhoff 2506 McCrae New Braunfels, TX 78130
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.
12.	Warren Washington 1892 Sperling Dr. Mobile, AL 36695
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i>

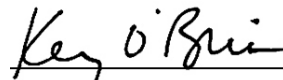
	Plaintiff who will testify on his employment with GES and the facts and circumstances that underlie his claims for bonuses and overtime pay and the working conditions for the other plaintiffs in this case.	
13.	Laura Holt	200 Alonzo Ct. Niceville FL 32580
	x Live <input type="checkbox"/> Deposition x Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Former GES Field Manager who will testify on her employment with GES, the connections to GES and related activities of Defendant ARS US, as well as discussions and events relating to the work performed by Plaintiffs, their bonus plan, and the non-payment of their bonuses as well as her own. (Ms. Holt is represented by the O'Brien Law Firm in connection with her own claims against GES and ARS US.)	
14.	Lisa Moutsanides	1238 SE Pine St. #B Roseburg, OR 97470
	x Live <input type="checkbox"/> Deposition x Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Former GES Field Inspector and a former Plaintiff in this case (settled) who will testify on her employment with GES and the facts and circumstances her claims for bonuses and overtime pay were based, as well as the working conditions for the plaintiffs in this case.	
15.	Nathan Normoyle	22511 Trailwood Lane Tomball, TX 77375
	x Live <input type="checkbox"/> Deposition x Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i>	

	<p>FLSA Defendant who may be called to testify on the operations of the GES and ARS US businesses relevant to Plaintiffs' claims, his work in connection with both operations as well as the work of Defendant Needham, the development of the bonus plan for the Field Inspectors, the relationship between GES and ARS US on the one hand and the McClenny Moseley & Associates Law Firm on the other, and the non-payment of bonuses to the Field Inspectors.</p>	
16.	Scott Jacobi	310 Mill Creek Road Pinehurst, TX 77362
	<p> <input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian </p> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>Chief Financial Officer of ARS US who had significant involvement in the financial strategizing, operations, and decision making of GES and the funding of GES by ARS US and/or related legal entities, including the outside funding of GES's payroll and purchasing activities. He may be called to testify on those relationships as well as the relationship between GES and ARS US on the one hand and the McClenny Moseley & Associates Law Firm on the other. He may also testify on the activities of Defendants Normoyle and Needham in connection with ARS US and GES.</p>	
17.	Michael Needham	27657 Commerce Oaks Drive, Conroe, TX 77385
	<p> <input checked="" type="checkbox"/> Live <input checked="" type="checkbox"/> Deposition (if he does not appear live) <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian </p> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>FLSA Defendant who may be called to testify on the operations of the GES and ARS US businesses relevant to Plaintiffs' claims, his work in connection with both operations as well as the work of Defendant Normoyle, the development of the bonus plan for the Field Inspectors, the relationship between GES and ARS US on the one hand and the McClenny Moseley &</p>	

	Associates Law Firm on the other, and the non-payment of bonuses to the Field Inspectors.	
18.	John Z. Moseley	1214 W. Dallas St. Houston, Texas 77019
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Principal in the McClenny Moseley & Associates Law Firm who may testify on the relationship between MMA, and GES and ARS US, including ARS US's investment in MMA, and the work performed by GES and ARS US for MMA.	
19.	James McClenny	80 Ridgelake Scenic Dr Montgomery, TX 77316-6933
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Principal in the McClenny Moseley & Associates Law Firm who may testify on the relationship between MMA and GES and ARS US, including ARS US's investment in MMA, and the work performed by GES and ARS US for MMA.	
INDIVIDUALS WHO MAY BE CALLED IF NEEDED		
20.	Trevor Brill	6320 Whirlwind Drive Colorado Springs, CO
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Brill is a former General Manager of GES who may be called to testify on the operations of GES while he was employed, the relationship between ARS US and GES, the relationship between the MMA law firm on the one hand and GES and ARS US on the other, the work performed by Defendants Normoyle	

	and Needham in connection with GES, the hiring of Field Inspectors, including some of the Plaintiffs, during his tenure, and the duties of a GES Field Inspector.
21.	Kerry O'Brien O'Brien Law Firm 1011 Westlake Drive, Austin, TX 78746
	<input checked="" type="checkbox"/> Live (or by post-trial affidavit) <input type="checkbox"/> Deposition <input type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input type="checkbox"/> Record Custodian O'Brien may be called to testify as an expert witness on Plaintiffs' claim for attorney fees in this case, both under Ch. 38 of the Texas Civil Practices & Remedies Code (unpaid bonuses) as well as under the Fair Labor Standards Act (unpaid overtime wages).
Plaintiffs also reserve the right during its case-in-chief to call any witnesses identified in Defendants' Trial Witness List.	

Respectfully submitted,



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January 3, 2025
Date

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